Actually, the "area of dominance influence' ("ADI"), as that term is defined by the audience rating companies, is an even more accurate measure of a station's economic influence, as the ADI measures counties in which the station's service is "dominant".[32] The relevance of the ADI is particularly strong in an environment of expanded media choice and the fungibility of viewing options. It is axiomatic to suggest that advertisers would prefer placement in viewing choices which standout from the crowd and not blend into it. Accordingly, media buying decisions are even more influenced by ADI circulation and demographic considerations than simply signal service contours.[33]

It is in this domain -- the ADI -- that local stations also have the greatest potential to affect their own fate in revenue terms. At the national or regional spot level, local television stations face their greatest challenge from competing media. Media buying decisions at this level are statistical and impersonal. For local sales within a station's ADI, media buying decisions may be affected by unique marketing initiatives undertaken by each station.[34]

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[32] Id. Area of Dominant Influence ("ADI") is a geographic market design constructed by Arbitron that defines each television market based on viewing patterns. Each market's ADI consists of all counties in which the home market stations receive a preponderance of viewing.

[33] See Inman Affidavit at 3.

[34] Id. at 3.

It is, therefore in this universe of local sales that the separation of the stations is most acute.

In 1991, the last year for which full year figures are available, seventeen percent (17%) of WUTV (TV)'s and forty-four percent (44%) of WUHF-TV's revenues were "local", as opposed to national or regional spot advertising sold through "station reps".[35] Of that local revenue, fifty-nine percent (59%) and one hundred (100%) percent respectively came from businesses located in the counties which comprise each station's ADI or Grade A contour.[36]

Most significant, however, is the fact that a non-existent or truly minuscule portion of local sales came from businesses located in the area between the Grade A service contour and the Grade B of each station. During 1991, one percent (1%) of WUTV (TV)'s and none of WUHF-TV's local revenues came from businesses located in this differential

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[35] Id. at 1. Buffalo's local revenues are disproportionately lower because 55% of its advertising revenues come from Canada and is treated as "national" advertising.

[36] See Inman Affidavit at 2. Actually, the 59% is misleading in an understated way. The remaining 41% of "local" station revenue is "paid sustaining programming" from national sources which is recorded as "local" revenue because it is not placed through a national sales representative but directly through the station. Were this category excluded from local sales, 99% of WUTV (TV)'s local revenues would be from businesses located within its ADI/Grade A.

area.[37] The area between the Grade A contour and the Grade B is simply of no relevance to the economic power of the station. Clearly, then, an ADI or Grade A standard is a far more accurate measure of station economic power, or the potential to abuse that power, with regard to advertisers, than the Grade B standard presently in place.

A similar conclusion can be drawn regarding economic power in the context of dealing with program suppliers. WUTV (TV) and WUHF-TV are both affiliates of the Fox television network. Their network compensation arrangements are predicated on individual station performance in ratings terms relative to the national network average ratings.[38] Again, ratings are derivative from circulation and total television homes, the dominant portion of which lies within the Grade A contours of the respective stations.

In terms of dealing with program syndicators the price for a program negotiated by a syndicator will be determined, in large part, by market size, household circulation and, therefore, ratings potential for the daypart in which the

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[37] See Inman Affidavit at 2. The 1% is aberrational. It is attributable to clients with substantial business presence in the Buffalo ADI/Grade A but whose advertising decisions are made in Rochester offices for administrative convenience.

[38] See Inman Affidavit at 3.

program is to be played.[39] Again, to the extent that circulation and ratings are more determined by the service area within the Grade A contour than in the area between the Grade A and Grade B, a Grade A overlap standard is more appropriate.

From almost every conceivable perspective then -- national and local advertising, program schedules, network compensation, program syndication negotiations -- Buffalo and Rochester are completely separate markets, WUTV (TV) and WUHF-TV are stations operated in a completely independent manner and both derive their economic power from their respective ADI and Grade A service areas. Accordingly, Commission concerns regarding undue concentration of economic power would be more than adequately addressed though the adoption of an overlapping Grade A standard for its duopoly rule.

E. UHF Station Overlap Standard.

The Grade A standard is particularly appropriate in the UHF television service. As the Commission has often concluded, UHF still remains at a disadvantage to VHF services. UHF stations require far greater transmission power than VHF stations to reach an equivalent geographic

[39] Id. Program pricing is also a function of the availability, attractiveness and past performance of alternative programs available in the market.

area. This higher power requirement leads to greater operating costs in certain areas. The signal propagation characteristics of UHF stations are also more fragile than VHF stations and subject to greater interference potential. Signal strength fall off as a function of distance from the transmitter is more precipitous for UHF stations than for VHF. And higher channel assignments generally mean that UHF stations have a lower audience sampling priority for both over-the-air and cable transmission.

All of the foregoing characteristics recommend that the Commission look at the core and not peripheral service area of a UHF station in assessing its economic power for the purposes of the duopoly rule. As emphasized above, that core service area is the ADI and Grade A contour. Because of their unique technical characteristics, this is particularly true of UHF stations. Accordingly, at a minimum, in modifying its duopoly, the Commission should adopt a Grade A service contour overlap standard for UHF stations.

F. De Minimis Overlap Waiver Standards Should Be Clarified And Liberalized.

With regard to whatever overlap standard the Commission decides to adopt, and particularly if the Commission were to retain a Grade B prohibited overlap, the Commission should clarify and liberalize a de minimis overlap waiver standard ("*de minimis* overlap"). Specifically, the Commission should adopt a *de minimis* overlap standard based solely on: (1) the population in the overlap area expressed as a percentage of the total population within each station's relevant contour; and (2) the number of alternative video services available to that overlap population. The Commission should permit contour overlap when no more than ten percent (10%) of a station's population served lies within the overlap area and the majority of those within the overlap area have access to six (6) unduplicated over-the-air television signals or more than twenty (20) video services regardless of the means of transmission into the home.[40] Furthermore, the Commission should use only actual service contours and not predicted contours in making its calculations.

1. The Current *De Minimis* Waiver Standard Lacks Administrative Clarity And Certainty.

Under present Commission policy, the extent to which contours overlap establishes the extent to which a duopoly waiver would impact the public interest.[41] If the overlap

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[40] Alternatively, the Commission could adopt a *de minimis* standard where the population within the overlap area represents no more than five percent (5%) of the total population of the service area of the two commonly owned stations combined.

[41] *Press Broadcasting Co.*, 65 R.R. 2nd 845, 847 & n.5.

is substantial, compelling public interest considerations must be shown to support the waiver. However, if the overlap is "de minimis", waivers are granted routinely.[42]

The Commission has generally taken an ad hoc factual approach to determining de minimis overlap. This approach has sometimes led to confusion and uncertainty and has undeniably added to the administrative burden of determining waiver petitions. Much as the Commission decided in 1964 to simplify the duopoly rule itself by adopting a fixed contour standard for a previously subjective ad hoc approach, the Commission should adopt a fixed standard for what constitutes de minimis overlap.

2. The De Minimis Overlap Waiver Standard Should Be A Fixed One Based On Population And Service Availability Within The Overlap Area.

As is set forth extensively above, the Commission's concern in the duopoly rule should be the undue concentration of economic power and economic power in television terms is derived from population served and the extent of competition from other video services. Land area per se, which has been

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[42] See e.g., Capital Cities Communications, Inc., 59 R.R.2d 451, 461 n.21 (1985); United Community Enterprises, 37 F.C.C.2d 953, 960-61 (1972); John Hay Whitney, 28 F.C.C.2d 736, 751-72 (1971).

a consideration in past Commission decisions, is really irrelevant and should be discarded as an analytic tool. A population standard which takes into account the service available to that population would be a more appropriate and useful measure.

If less than ten percent (10%) of the source of a station's economic power, i.e., the population it serves, is shared with a commonly owned station, the Commission can reasonably conclude that common ownership does not unduly enhance either stations' economic power. This is particularly true in light of the extensive discussion above that, despite geographic proximity, contiguous television markets are separate and distinct and station operations, even if under common control, are completely independent.

An even more pertinent and incisive measure of economic power in the overlap area is the availability of service to the population there. In the search for a level of service in an overlap area which would satisfy Commission concerns for the public interest, instruction might be taken from the Commission's proceedings to determine "effective competition" in the cable television context. The Commission was directed by the Cable Communications Policy Act of 1984, P.L. No. 98-549, 98 Stat 2779 (1984), to "define the circumstances in which a cable system is not subject to effective competition" thereby permitting regulation of basic cable rates by local franchising authorities.[43] As analytic background to the adoption of its present "effective competition" rules the Commission said:

> "The number of over-the-air broadcast signals required to provide effective competition to basic cable service must be sufficient to allow viewers adequate and significant programming choices. Further, the number of signals chosen is intended to prevent the basic tier offering from becoming a source of market power for the cable operator."[44]

The Commission went on to conclude that "effective competition" existed when six (6) unduplicated over-the-air broadcast signals were available to the entire cable community.[45]

In essence, therefore, the Commission determined in this context that the availability of six (6) unduplicated over-the-air broadcast signals in a certain area provided viewers with "adequate and significant programming choices" and that, effectively, there was not an undue concentration of media power. ACT III finds no reason why the Commission should not adopt a similar standard in the context of a de minimis waiver of the duopoly rule. If a certain number of stations provide viewers in an area with "adequate and significant programming choices" in one context, they should in the

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[43] Report and Order and Second Further Notice of Proposed Rulemaking in Docket in Docket MM 90-4, 69 RR2d 671, 672.

[44] Id. at 676.

[45] Id.

other. If the balance of media power is acceptable in one context, it should be in the other. ACT III urges the Commission to apply the same analysis and reasoning of the "effective competition" proceeding and determine that the availability of six (6) unduplicated over-the-air broadcast signals in a duopoly overlap area constitutes an environment in which the common control of two overlapping stations does not disserve the public interest.

Alternatively, the Commission could view de minimis overlap from the perspective of the total programming choices available to the population of the overlap area regardless of means of transmission into the home. If stations under common control represent no more than ten percent (10%) of a majority of viewers in the overlap area's service options, i.e., two (2) of twenty (20) or more cable channels plus home video, the Commission can reasonably conclude, as it did in an analogous way in the "effective competition" proceeding, that there is adequate and significant programming choice for that majority and no undue market power rests in the commonly controlled stations' hands.

ACT III also believes the Commission should use actual contour data instead of predicted contour data in determining the area of overlap. The Commission, in its effort to promulgate more precise regulations, should base its actions on actual rather than theoretically generated data. It should be actual population and actual service availability which the Commission considers.

G. There Is No Interplay Between Changes In The Duopoly Overlap Standard And National Ownership Limitations.

ACT III believes that there is little interplay between the changes in the duopoly rule it urges the Commission to make and any potential liberalization of the national ownership limitations. The duopoly rule is micro-economic and behavioral; the national ownership limitations are macro-economic and structural. The national ownership limitations speak to whether economic power can be amassed on a nationwide basis sufficient to provide commonly owned stations an opportunity to abuse that power at a national level vis-a-vis program suppliers and advertisers. The duopoly rules address the behavioral inter-relationship between specific stations in a well-defined and local geographic context. The two sets of rules complement each other, but do not interact.

ACT III also does not believe that there is a specific need to address questions of regional concentration of power separately from the duopoly rule and the national ownership limitations. As discussed extensively above, despite relative geographic proximity, stations, even those under common control, act independently and in direct and unique response to the conditions of their respective market. From this perspective, a contiguous market might just as well be on the other side of the country.

If any economic power is amassed by several stations under common control in a specific geographic area, it would be evident and applied at a national level. Such power would be the same whether derived from a specific geographic region or the nation-at-large, because the economic power would be a function of the total audience circulation under common control regardless of its geographic location. This should be the concern and province of the Commission's national ownership limitations. Because economic power at a national level is not attributable to its geographic source, but merely its shear magnitude, "regional concentration" is not a meaningful concept. Consequently, the Commission requires only national ownership limitations to address these questions of national concentration of economic power. In other words, the Commission, on the one hand, may see a role for national ownership limitations regarding national concentration of power and duopoly rules regarding local concentration of power, but since nothing lies in between, there is certainly no role for an intermediate rule pertaining to "regional concentration."

CONCLUSION

ACT III believes that it has more than adequately demonstrated that the present duopoly rule is anachronistic and must be changed. Adoption of an overlapping Grade A standard would more than adequately address the Commission's concerns with regard to the potential undue concentration of economic power in television stations under common control with relatively close geographic proximity and that no other rules in this regard are required.

Respectfully Submitted,

ACT III Broadcasting, Inc.
110 E. 59th Street
New York, NY 10022

By Donald D. Wear, Jr.
Donald D. Wear, Jr.
Its Attorney

Donald D. Wear, Jr.
Attorney at Law
1776 K Street, NW
Washington, DC 20006

William Lilley III
Policy Communications, Inc.
1615 L Street, NW
Washington, DC 20036

Lawrence DeFranco
Program Flow, Inc.
1937 Kirby Road
Falls Church, VA 22043

August 24, 1992

A

Table A

CITY COMPARISONS

1960 Census Data v. 1990 Census Data

	BUFFALO		ROCHESTER	
	1960	1990	1960	1990
Population	532,759	1,232,000	318,611	1,119,000
Retail Sales*	3,592	8,400	2,496	8,200
Manufacturing Units	4,893	1,970	7,113	6,226
Manufacturing Value Added**	3.13	1.6	4.79	5.1

* In Millions of 1992 Dollars ** In Billions of 1992 Dollars

TABLE B

Radio Stations

	BUFFALO		ROCHESTER	
	AM	FM	AM	FM
1964	7	10	6	7
1992	7	16	7	14

Television Stations

	BUFFALO	ROCHESTER
1964	5	4
1992	8	5

Source: 1964 Broadcasting Yearbook
1992 Broadcasting & Cable Marketplace

C

TABLE C

Cable Television Systems Within Buffalo Area of Dominant Influence

Location	Subscribers 1964	Subscribers 1992	Homes Passed and (Channels) 1964	Homes Passed and (Channels) 1992
Alfred	--	600	--	750 (12)
Allentown	--	54	--	72 (12)
Angelica	--	517	--	517 (12)
Bolivar	--	768	--	768 (12)
Buffalo	--	85,282	--	155,591 (60)
Dunkirk	--	5,771	--	10,931 (80)
East Aurora	--	5,275	--	5,275 (53)
Erie County	--	149,759	--	190,916 (35)
Fredonia	--	4,100	--	5,247 (35)
Friendship	--	420	--	472 (12)
Grand Island	--	4,084	--	5,868 (36)
Jamestown	--	22,000	--	25,785 (35)
Lancaster	--	12,010	--	19,223 (35)
Lockport	--	11,518	--	18,754 (36)
Niagra Falls	--	25,442	--	41,785 (62)
Silver Creek	--	1,862	--	2,861 (62)
Springville	--	NA	--	11,887 (36)
Stafford	--	28,400	--	28,400 (37)
Warsaw	--	1,550	--	1,600 (35)
Wellsville	--	4,392	--	5,602 (42)
Westfield	--	3,114	--	5,428 (54)
Whitesville	--	165	--	170 (7)
Totals	0	367,083	0	537,902

Source:

Television & Cable Factbook (Cable & Services Vol. 34)
Television & Cable Factbook (Cable & Services Vol. 60)

D

TABLE D

Cable Television Systems Within Rochester Area of Dominant Influence

Location	Subscribers 1964	Subscribers 1992	Homes Passed and (Channels) 1964	Homes Passed and (Channels) 1992
Dansville	--	3,520	--	3,520 (35)
Geneva	--	39,360	--	65,397 (37)
Monroe	--	7,940	--	9,433 (35)
Rochester	--	183,625	--	302,896 (40)
Stafford	--	28,400	--	28,400 (37)
Totals	0	262,845	0	409,646

Source:

Television & Cable Factbook (Cable & Services Vol. 34)
Television & Cable Factbook (Cable & Services Vol. 60)

E

	7/26/92 SUNDAY	7/27/92 MONDAY	7/28/92 TUESDAY	7/29/92 WEDNESDAY	7/30/92 THURSDAY	7/31/92 FRIDAY	8/1/92 SATURDAY	
6:00 a	INFOMERCIAL	VIDEO POWER 31	VIDEO POWER 32	VIDEO POWER 33	VIDEO POWER 34	VIDEO POWER 35	INFOMERCIAL	6:00 a
6:30 a	MASS FOR SHUT INS	MERRIE MELODIES 31	MERRIE MELODIES 32	MERRIE MELODIES 33	MERRIE MELODIES 34	MERRIE MELODIES 35	INFOMERCIAL	6:30 a
7:00 a	INFOMERCIAL	DUCKTALES DT-76	DUCKTALES DT-92	DUCKTALES DT-77	DUCKTALES DT-97	DUCKTALES DT-90	INFOMERCIAL	7:00 a
7:30 a	INFOMERCIAL	CHIP 'N' DALE CD-16	CHIP 'N' DALE CD-17	CHIP 'N' DALE CD-20	CHIP 'N' DALE CD-04	CHIP 'N' DALE CD-52	INFOMERCIAL	7:30 a
8:00 a	TOM & JERRY & FRIENDS	FOX PETER PAN	FOX PETER PAN	FOX PETER PAN	FOX PETER PAN	FOX PETER PAN	KILLER TOMATOES	8:00 a
8:30 a	↓	G. I. JOE 60041	G. I. JOE 19920014	G. I. JOE 19920017	G. I. JOE 19920019	G. I. JOE [illegible]	BOBBY'S WORLD	8:30 a
9:00 a	TOM & JERRY & FRIENDS	INFOMERCIAL	INFOMERCIAL	INFOMERCIAL	INFOMERCIAL	INFOMERCIAL	TOM & JERRY'S KIDS	9:00 a
9:30 a	↓	SUCCESS -N- LIFE	SUCCESS -N- LIFE	SUCCESS -N- LIFE	SUCCESS -N- LIFE	SUCCESS -N- LIFE	TAZMANIA	9:30 a
10:00 a	ZOO LIFE SERIES 104	↓	↓	↓	↓	↓	BILL & TED'S EXCELLENT ADV.	10:00 a
10:30 a	BUCKY O'HARE 4610-10	INFOMERCIAL	INFOMERCIAL	INFOMERCIAL	INFOMERCIAL	INFOMERCIAL	LITTLE SHOP	10:30 a
11:00 a	HARRY AND HENDERSONS 77113	700 CLUB	700 CLUB	700 CLUB	700 CLUB	700 CLUB	SUPER BOY 9104	11:00 a
11:30 a	LIGHTNING FORCE 9105	↓	↓	↓	↓	↓	SUPER FORCE 9107	11:30 a
12:00 p	PULSE	MATLOCK [illegible]	MATLOCK 9012	MATLOCK 9013	MATLOCK 9014	MATLOCK 9015	WWF SUPERSTARS 309	12:00 p
12:30 p	INFOMERCIAL	↓	↓	↓	↓	↓	↓	12:30 p
1:00 p	Sunday Movie I	I LOVE LUCY 40179	I LOVE LUCY 00001	I LOVE LUCY 00002	I LOVE LUCY 00003	I LOVE LUCY 00004	AMERICAN GLADIATORS 322	1:00 p
1:30 p	STAND BY ME Cont'd	JENNY JONES 42	JENNY JONES 143	JENNY JONES 86	JENNY JONES 145	JENNY JONES 114	↓	1:30 p
2:00 p	↓	↓	↓	↓	↓	↓	FALL GUY 7037	2:00 p
2:30 p		INFOMERCIAL	INFOMERCIAL	INFOMERCIAL	INFOMERCIAL	INFOMERCIAL	↓	2:30 p
3:00 p	Sunday Movie II	TALE SPIN TS-39	TALE SPIN TS-49	TALE SPIN TS-47	TALE SPIN TS-43	TALE SPIN TS-13	BAYWATCH 2001	3:00 p
3:30 p	PERRY MASON:ALL-STAR Cont'd	DARKWING DUCK DW-28	DARKWING DUCK DW-22	DARKWING DUCK DW-56	DARKWING DUCK DW-31	DARKWING DUCK DW-25	↓	3:30 p
4:00 p	ASSASSIN	FOX BEETLEJUICE	FOX BEETLEJUICE	FOX BEETLEJUICE	FOX BEETLEJUICE	FOX BEETLEJUICE	BEAUTY AND THE BEAST 18	4:00 p
4:30 p	↓	JAMES BOND, JR. 9075-34	JAMES BOND, JR. 9075-55	JAMES BOND, JR. 9075-60	JAMES BOND, JR. 9075-29	JAMES BOND, JR. 9075-40	↓	4:30 p
5:00 p	HUNTER 5705	TINY TOON ADVENTURE 147	TINY TOON ADVENTURE 165	TINY TOON ADVENTURE 156	TINY TOON ADVENTURE 150	TINY TOON ADVENTURE 162	LITTLE HOUSE-PRAIRIE 1-004	5:00 p
5:30 p	↓	TEENAGE NINJA TURTLS 07	TEENAGE NINJA TURTLS 36	TEENAGE NINJA TURTLS 53	TEENAGE NINJA TURTLS 54	TEENAGE NINJA TURTLS 35	↓	5:30 p
6:00 p	STAR TREK (ORIGINAL) 39	STAR TREK & NEXT GEN 187	STAR TREK & NEXT GEN 190	STAR TREK & NEXT GEN 191	STAR TREK & NEXT GEN 192	STAR TREK & NEXT GEN 193	STAR TREK (ORIGINAL) 40	6:00 p
	↓	↓	↓	↓	↓	↓	↓	

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	Sunday							
6:30 p								6:30 p
7:00 p	BILL & TED	CHEERS 178	CHEERS 180	CHEERS 182	CHEERS 184	CHEERS 186	HUNTER 5002	7:00 p
7:30 p	TRUE COLORS	CHEERS 179	CHEERS 181	CHEERS 183	CHEERS 185	CHEERS 187	↓	7:30
8:00 p	IN LIVING COLOR	* Fox Night/Movies	Movie	BEVERLY HILLS 90210	SIMPSONS	AMERICAS MOST WANTED	COPS I	8:00 p
8:30 p	RACHEL GUNN, R.N.	JAWS Cont'd	JAWS: THE REVENGE Cont'd	↓	PARKER LEWIS	↓	COPS II	8:30 p
9:00 p	MARRIED W/...	↓	↓	MELROSE PLACE	BEVERLY HILLS 90210	SIGHTINGS	CODE THREE	9:00 p
9:30 p	HERMAN'S HEAD			↓	↓	HIDDEN VIDEO	VINNIE & BOBBY	9:30 p
10:00 p	DOWN THE SHORE	↓	HUNTER 5404	* INFOMERCIAL	BAYWATCH 2002	STAR TREK: NEXT GEN. 219	COMIC STRIP LIVE LATE SHOW	10:00 p
10:30 p	STAND BY YOUR MAN	* INFOMERCIAL	↓	* INFOMERCIAL	↓	(The First Duty)	↓	10:30 p
1:00 p	INFOMERCIAL	STUDS	STUDS	STUDS	STUDS	STUDS	ARSENIO HALL	11:00 p
1:30 p	INFOMERCIAL	ARSENIO HALL	ARSENIO HALL	ARSENIO HALL	ARSENIO HALL	ARSENIO HALL	↓	11:30 p
2:00 a	INFOMERCIAL	↓	↓	↓	↓	↓	INFOMERCIAL	12:00 a
2:30 a	INFOMERCIAL	BENNY HILL 086	BENNY HILL 087	BENNY HILL 088	BENNY HILL 089	~~BENNY HILL~~ PAID PGM	INFOMERCIAL	12:30 a
1:00 a	FRIDAY THE 13TH 59	ALL IN THE FAMILY 7418	ALL IN THE FAMILY 7419	ALL IN THE FAMILY 7420	ALL IN THE FAMILY 7421	Specials: THE HORROR	Late Night Movie	1:00 a
1:30 a	↓	BARNEY MILLER 096	BARNEY MILLER 097	BARNEY MILLER 098	BARNEY MILLER 099	HALL OF FAME 11 Cont'd	PERRY MASON: THE ALL- Cont'd	1:30 a
2:00 a	SIGN OFF	THREE'S COMPANY 141	THREE'S COMPANY 142	THREE'S COMPANY 143	THREE'S COMPANY 144	↓	STAR ASSASSIN	2:00 a
2:30 a		HAPPY DAYS 234	HAPPY DAYS 235	HAPPY DAYS 236	HAPPY DAYS 237		↓	2:30 a
3:00 a		INFOMERCIALS	INFOMERCIALS	INFOMERCIALS	INFOMERCIALS	INFOMERCIALS	Late Late Movie	3:00 a
3:30 a		Cont'd	Cont'd	Cont'd	Cont'd	Cont'd	QUIET VICTORY Cont'd	3:30 a
4:00 a		Cont'd	Cont'd	Cont'd	Cont'd	Cont'd	↓	4:00 a
4:30 a		Cont'd	Cont'd	Cont'd	Cont'd	Cont'd		4:30 a
5:00 a		Cont'd	Cont'd	Cont'd	Cont'd	Cont'd	RAWHIDE 0032	5:00 a
5:30 a		Cont'd	Cont'd	Cont'd	Cont'd	Cont'd	↓	5:30 a
	7/26/92 SUNDAY	7/27/92 MONDAY	7/28/92 TUESDAY	7/29/92 WEDNESDAY	7/30/92 THURSDAY	7/31/92 FRIDAY	8/1/92 SATURDAY	

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